



**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

| | | |
|----------------------------------|---|---------------------------------|
| JANE DOE 2, |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 3: 23-cv-00582 |
| |) | |
| v. |) | |
| |) | JUDGE ALETA A. TRAUGER |
| JIMMIE ALLEN, AADYN'S DAD |) | |
| TOURING, INC., CHARLES HURD, and |) | |
| JOHN DOES 1-100, |) | |
| |) | |
| Defendants. |) | |
| |) | |

JOINT MOTION FOR EXTENSION OF DISCOVERY AND CASE DEADLINES

Plaintiff Jane Doe 2 ("Plaintiff") and Defendants Jimmie Allen ("Allen") and Aadyn's Dad Touring, Inc. ("ADT") (collectively "Parties") jointly move for an extension of discovery deadlines. In support thereof, the Parties state as follows:

1. Plaintiff filed her Verified Complaint on June 9, 2023. [ECF 1].
2. Defendants Allen and ADT filed an Answer and Counterclaim on July 13, 2023. [ECF 11].
3. Plaintiff filed a Motion to Dismiss Jimmie Allen's Counterclaim for Conversion on August 1, 2023. [ECF 15]. The Motion to Dismiss the Counterclaim was denied on January 30, 2024. [ECF 27].
4. On October 2, 2023, the Court entered an Initial Case Management Order setting deadlines for discovery and pre-trial motions. [ECF 21]. In particular, written discovery was required to be served and all fact witness depositions held by June 28, 2024.